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Target Stores

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## IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

12 DIVISION

MARTHA BOYLES

PLAINTIFF

VS.

CASE NO.

60CV-14-1819

TARGET CORPORATION

DEFENDANT

COMPLAINT

Comes Anna Boyles, pro se, and for her Complaint against Target Corporation states:

1. Plaintiff, Martha Boyles, is a resident of the City of Roland, Pulaski County, Arkansas.
2. Defendant, Target Corporation, is a foreign corporation registered to do business in the State of Arkansas. At all times mentioned, Defendant was, and still is, the owner of and in possession and control of a building located at 12700 Chenal Parkway, Little Rock, Arkansas 72211.
3. On May 11, 2011, at about 2:50 p.m., Plaintiff was lawfully in Defendant's store as a customer of Defendant for the purpose of purchasing goods, and as Plaintiff was purchasing a hot dog from the food vendor at the front of Defendant's store, Plaintiff slipped on a wet area of the floor, and Plaintiff fell heavily on the floor, sustaining injuries.
4. The accident and resulting injuries to Plaintiff were caused solely by the negligence of Defendant without any contributory negligence on the part of Plaintiff.
5. The negligence of Defendant at the above time and place, among other things, consisted of the following:
  - a. in carelessly and negligently permitting and allowing water to collect and remain on the floor of the store, which rendered the floor slippery and unsafe;
  - b. in carelessly and negligently failing to remove the water;

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c. in failing properly to maintain the floors of the store and, particularly, the floor in the area of the accident, in a clean and safe condition for customers using the facilities of the store; and

d. in failing properly and adequately to supervise and oversee the store so as to prevent the collection of water and dangerous substances on its floors.

6. Defendant had actual knowledge of the fact that water had collected on the floor for a long period of time, and of the fact that the floor was thereby rendered dangerous to persons passing over it. Or, if Defendant lacked the actual knowledge, the conditions had existed for so long a time prior to the happening of the accident to Plaintiff, that Defendant, in the exercise of due care, could and should have had such knowledge and notice.

7. Plaintiff suffered numerous injuries as a result of the accident, including injuries to her body, which in turn have caused her to incur past and future pain, suffering and mental anguish, past and future medical expenses, past and future loss of mobility and functionality, and diminished quality of life.

8. Plaintiff demands a trial by jury on all issues.

WHEREFORE, Plaintiff prays for judgment against Defendant for damages as set forth in paragraph 7; and for all other relief to which she may be entitled.

Respectfully Submitted,

Martha Boyles  
Martha Boyles

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